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JONATHAN PARFREY

MR. PARFREY: Thank you for the opportunity to testify regarding the Department of Energy's Draft Environmental Impact Statement for a geologic repository for the disposal of spent nuclear fuel and high-level radioactive waste at Yucca Mountain.

I am executive director of the Los Angeles office of Physicians for Social Responsibility. We come today out of concern for the public health of those that would be working at the facility as well as those that would be potentially exposed to radiation in the movement towards depositing the radioactivity at Yucca Mountain. I also sit on the advisory panel organized by the University of California President Richard Atkinson for Governor Gray Davis in finding disposal strategies for California's low-level radioactive waste. Physicians for Social Responsibility in Los Angeles represents membership throughout Southern California, including Los Angeles, Orange, Riverside, San Bernardino Counties, areas in which vehicles transporting radioactive waste would travel if Yucca Mountain repository is approved.

1... The Draft Environmental Impact Statement fails to serve the public in a number of key ways. I will address how the Draft EIS falls shy of adequately considering the impacts of transporting the waste materials to Yucca Mountain. The DOE notes that the region of influence for public health and safety along existing transportation routes is a half mile from the center line of transportation rights of ways for non-accident conditions, and fifty miles for accident conditions. However, the Draft EIS neither shows specific routes outside of Nevada to be used to transport radioactive waste materials, nor addressed the baseline conditions along those routes.

In order to do a complete impact analysis, the DOE should map specific routes and establish baseline conditions along those routes as well as clearly and honestly identify potential impacts along those routes. One can look at the map of current locations of radioactive waste to see that this highly irradiated waste would need to travel through forty-three states, past the homes, workplaces and hospitals of fifty million Americans to get to Yucca Mountain. Those fifty million Americans have a right to be informed about the risks associated with transporting nuclear waste and the impact on public health and the environment that would incur from the transport -- transportation.

2 The Draft EIS should clearly and accurately characterize the risks involved along the transportation routes and it should use the most current information available to do so. Further, it should include site specific data to show the effects of accidents in highly populated areas or areas where it would be most difficult to retrieve a leaking casket (sic), such as ravines and rivers. The Draft EIS bases its conclusion about the impacts of nuclear waste transportation on an outdated and incomplete study, the modal study done in 1987 by Lawrence Livermore Labs for the Nuclear Regulatory Commission. The NRC itself has recognized the need to update and expand the modal study and has thus contracted with Sandia National Labs to revise the 1987 study. However, this revision, modal 2, will not be completed until the year 2003, two years after a final decision will have been made about Yucca Mountain.

3 The Draft EIS fails to address the fact that the number of shipments and amount of radioactive material that will be shipped is unprecedented in world history. About ninety percent of the volume would be spent fuel from nuclear power plants and virtually none of this type of material has ever been shipped before. The DOE knows which routes it will use to transport radioactive waste to Yucca Mountain. Specific routes were needed to run the computer analyses programs, highway and interline to complete the DEIS. The DOE should name those routes in the DEIS. The DOE's argument that the routes might change or that the states may designate alternative routes is not an acceptable justification for refusing to include the specific routes used to analyze potential impacts in the Draft EIS.

4 [The Draft EIS does not examine what emergency response personnel training and equipment would be needed in all of the communities along the transportation routes and what specific impacts of a transportation accident would be. Many local communities today lack special equipment and training necessary to respond to a radiological accident. Further, many hospitals do not have isolation rooms for radioactively contaminated victims.]

MR. LAWSON: Thirty minutes, please.

5 [MR. PARFREY: The fifty million Americans that will be affected by this unprecedented transportation campaign have a right to be informed about the risks they will face if Yucca Mountain is approved as a repository for nuclear waste. Doctors, nurses and emergency responders have a right to know what dangers their communities will be exposed to if this campaign is allowed to happen. The DOE has a responsibility to the people of America to honestly, clearly and accurately characterize the human health risks involved with nuclear waste transportation.] Thank you once again for the opportunity to speak with you today.